

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                                  )  
                                  )  
V.                              )  
                                  )  
                                  )  
JACOB GUERRERO              )  
                                  )  
                                  )  
Defendant.                   )

MBD

**EMERGENCY MOTION FOR STAY AND REVOCATION OF A RELEASE ORDER**

The United States, by and through the undersigned Assistant United States Attorney, hereby request an *Emergency Stay and the Revocation of a Release Order* issued by the Eastern District of California pursuant to 18 U.S.C. §3145(a). *See* Case No. 22-56-DB (E.D.Ca.).

Briefly, on April 12, 2022, Jacob Guerrero was charged by Complaint in this district with the sexual exploitation of children and attempt to do so, in violation of 18 U.S.C. §2251. *See* Case No. 22-6182-MPK. On April 14, 2022, Guerrero was arrested in the Eastern District of California. The government moved for detention, and, on April 20, 2022, the Magistrate Judge ordered Guerrero detained. On May 6, 2022, however, the Magistrate Judge reversed her prior Order, directing that Guerrero be released on conditions. That order has been stayed for fourteen days, until May 20, 2022, to allow the government to pursue this appeal.

As more fully set out in the attached memorandum, Guerrero is a danger to the public (especially children), and, there are no conditions or combination of conditions that could reasonably assure the safety of children in the community.

Accordingly, this Court should issue a stay of the release Order from the Eastern District of California pending a hearing before this Court pursuant to 18 U.S.C. §3145(a), and, should order the Defendant detained pending trial.

Respectfully Submitted,

RACHAEL S. ROLLINS  
United States Attorney

By: */s/ Mark Grady*  
Mark Grady  
Assistant United States Attorney

#### **CERTIFICATE OF COMPLIANCE**

Counsel have conferred and the defendant opposes a further stay of release and the government's request for detention.

*/s/ Mark Grady*  
Mark Grady  
Assistant United States Attorney

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this motion will be sent to counsel for defendant via ECF (and email).

*/s/ Mark Grady*  
Mark Grady  
Assistant United States Attorney